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Secretary  
Federal Communications Commission  
Washington, DC 20554

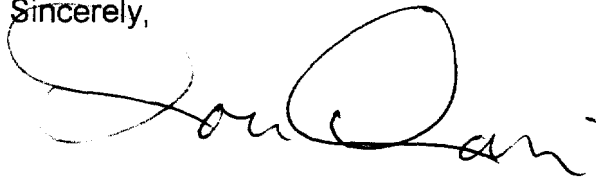
RE: MM Docket No. 00-158  
RM-9921

Greetings:

On behalf of the Alamo Navajo School Board, Inc. (ANSB), the petitioner in the above-referenced proceeding, enclosed are an original and four copies of ANSB's comments on this Petition for Rule Making for the allotment of a new non-commercial FM channel to Alamo, New Mexico.

I am a technical consultant for ANSB. Should there be any questions about the technical aspects of this Petition, I will be pleased to provide any necessary information.

Sincerely,



Don Davis

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

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**OCT 19 2000**

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In the Matter of

Amendment of Section 73.202(b)	)	
Table of Allotments	)	MM Docket 00-158
FM Broadcast Stations	)	RM-9921
(Alamo Community, New Mexico)	)	

To: Chief, Mass Media Bureau, Policy and Rules  
Division

**COMMENTS FROM PETITIONER**

The Alamo Navajo School Board, Inc. (ANSB), your petitioner in the above-styled proceeding, hereby submits its comments regarding the proposed allotment of FM Channel 298A as a non-commercial allotment to Alamo Community, New Mexico.

1. Your petitioner continues to wish to provide a first full-time non-commercial FM broadcast service to the Alamo community. If the Commission allots the channel to Alamo, ANSB will, at the earliest opportunity afforded by the Commission, file an application for the use of the channel, and if such application is granted, shall promptly construct the station and initiate non-commercial radio service to Alamo.

2. The coordinates provided in the Petition for Rule Making by ANSB are the coordinates of its non-commercial AM station, KABR. KABR is located at the Alamo Navajo School, which is the center of activities at Alamo, including the tribal government and medical facility. A coverage map is attached as Exhibit A which demonstrates that the allotment as proposed, if constructed at a moderate power level of 1,000 watts ERP, will cover the entire Alamo Community with a signal strength in excess of 70 dbu.

3. A non-commercial allotment is requested for use at Alamo by ANSB. ANSB provides educational services to the entire population of the Alamo Navajo Indian Reservation. ANSB's AM station, KABR, while limited to daytime-only operation, serves as the only daily information source for the population of the Alamo Reservation, in the Alamo native language as well as English. There is essentially no commercial activity on the reservation with which to support a commercial station. However, ANSB is financially and technically prepared to offer full-time non-commercial radio service to the Alamo Community and the Alamo Reservation immediately. Therefore, the allotment of the non-commercial channel is requested.

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4. The Commission requests a showing that a reserved band channel is unavailable at Alamo. Please see Exhibit B for an allotment study of the reserved band at the site specified in the Petition, demonstrating that no such channel is available.

WHEREFORE, your petitioner reiterates that a new non-commercial FM station, being the first full-time radio service and the only full-time native language radio service to the unique and remote Alamo band of Native Americans, would be of great benefit to the people of Alamo, New Mexico. Further, it is submitted that the non-commercial allotment of FM Channel 298A to Alamo would be an efficient utilization of the channel and would be in the public interest.

Respectfully submitted,

The Alamo Navajo School Board, Inc.

Burton Apache 10/11/00  
Burton Apache, President Date

The Alamo Navajo School Board, Inc.  
P.O. Box 907  
Magdalena, New Mexico 87825

(505)854-2543 ext 1301

Subscribed and sworn to before me this 11<sup>th</sup> day  
of October, 2000.

Charlotte Abayta  
Notary

My commission expires: March

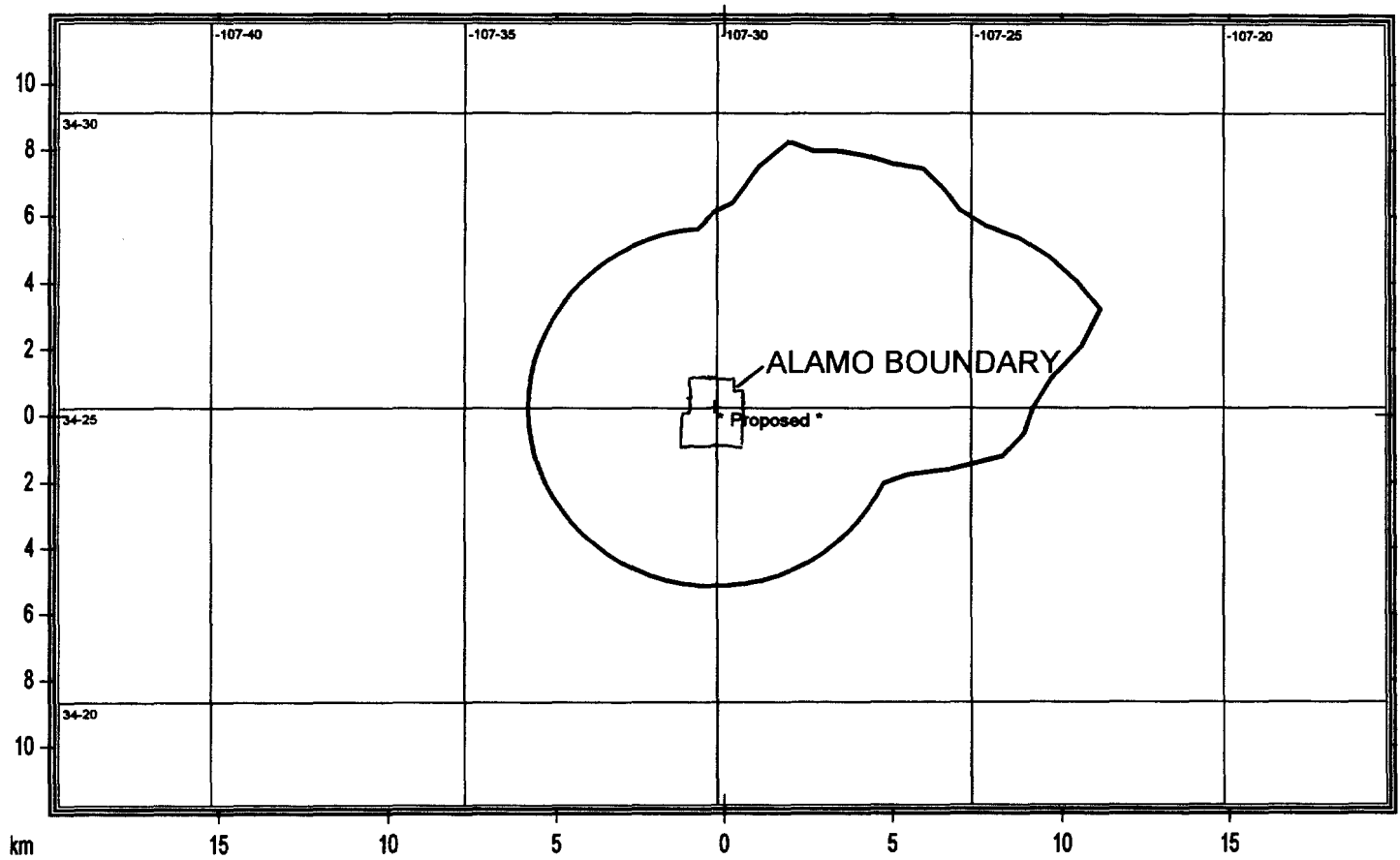
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## EXHIBIT A - ALAMO, NM PROPOSED 70 DBU COVERAGE CONTOUR



1,000 WATTS ERP, 50 M. AGL 34-25-01, 107-30-04

State Borders      Lat/Lon Grid

## EXHIBIT B

### RESERVED BAND ALLOTMENT STUDY ALAMO, NEW MEXICO FM CHANNELS 201-220

<u>CHANNEL</u>	<u>BLOCKED BY</u>	<u>CHANNEL</u>	<u>CITY</u>
201-203	KLYT	202	ALBUQUERQUE
202-206	BPED-990428MC	204	SOCORRO
202-206	BNPED-20000223ABS	204	BELEN
202-206	BPED-19990907MC	204	GALLUP
202-206	BNPED-20000223AAM	204	SOCORRO
202-206	BNPED-20000303AAY	204	SOCORRO
205-207	KANW	206	ALBUQUERQUE
207-209	ALLOCATION	208	SOCORRO
209-211	KUNM	210	ALBUQUERQUE
212-214	BPED-19970313MB	213	GRANTS
212-214	BPED-19970312MB	213	GRANTS
214-216	BPED-19970313MG	215	BELEN
216-220	KFLQ	218	ALBUQUERQUE